



January 3, 2002

gmc

North Bronson Industrial Area SF Site
Bronson, Branch County, Michigan

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Oversight Contractor: Roy. F. Weston

PRP Lead - Consent Decree for RD/RA with 4 PRPs and the City of Bronson, MI

History/Background

The North Bronson Industrial Area SF site consists of 2 sets of lagoons (eastern and western lagoons) and CD #30 (OU1), in 1998 the Industrial Sewer was added to the site as OU2. Industries in the area utilized the industrial sewer to transport waste liquids to the lagoons. City of Bronson is owner of the lagoons. RI/FS was performed by the MDEQ(MDNR) and FUND financed.

OU1

The ROD was signed in 1998. The selected remedy for this site included the excavation and consolidation of contaminated soils from the eastern lagoons into the western lagoon area, covered with an engineered cap or soil to allow for phytoremediation planting/ vegetation if proved to be feasible. Construction of wetland treatment system to treat groundwater from the lagoon areas. Excavation of contaminated sediments from the CD#30 and consolidating into the western lagoon area. U.S. EPA took the lead for RD/RA negotiations and CD was signed in March 1999.

Pre-Design Studies were required to gather more recent data (RI data collected from 1989-1992) to properly design the treatment system and determine the volumes of soils/sludges to be excavated.

Status and Issues of Concern

Pre-Design Studies began in February 2000 (CD entered on 2/29/00, which triggered the schedule). Field work took place in February/March 2001. Draft Pre-Design Studies report was submitted in July 2001. Report was unsatisfactory to EPA and MDEQ. The report was not only considered incomplete, but poorly prepared and reflected poorly collected data and interpretations of data. Slug tests were redone in October 2001 and the revised report was submitted by ARCADIS, PRP contractor on November 5, 2001.

The major issues of concern have been with groundwater data collection and installation of monitoring wells. MDEQ has been involved with the site since the RI/FS so they are very familiar with the history and hydrogeological aspects. Initial discussions and disagreements were during pre-design studies workplan. Discussions carried on for a few months until EPA decided

January 3, 2002

to move forward and approve workplan not incorporating some of MDEQ's requests.

The initial draft pre-design studies report prepared by ARCADIS was incomplete in meeting the requirements of the SOW. Initial slug tests were erroneous and conclusions based on this data was also erroneous. ARCADIS was making conclusions on "remedy decisions" before a complete site conceptual model could be developed from data.

The Revised Report is under review, comments have been received from Weston (Oversight contractor) and MDEQ's comments are pending. I have completed review and am preparing comment letter.

TO DO:

- **Complete review and comment letter** *done*
- **Comments from MDEQ** *done*
- **Discuss comments with MDEQ and Weston** *done*
- **Follow-up with SITE office, send report to them.**

OU2

The Industrial Sewer was added to the site during the 1998 ROD development for OU1. During their previous investigations, MDEQ had expressed multiple times that the site remedy should include the Industrial sewer and upstream sources (former facilities) because it was a source of contamination to the groundwater. U.S. EPA had responded that only the CD and lagoons were part of the Site, but after discussions agreed to include the industrial sewer because it was used as a transport vehicle to the lagoons, but that the upstream sources should be dealt with under State Authority. In 1998, there was not sufficient information to include the industrial sewer as part of the ROD for OU1, so it was separated into OU2.

MDEQ performed investigations for the industrial sewer and reported them in 2 Technical Memorandums, which are considered the RI for this OU2.

In September 2000, U.S. EPA issued a SNL to 3 PRPs to begin negotiations for FS and Risk Assessment. The 3 parties noticed are:

- **Bronson Reel (ITT)** *OK*
- **L.A. Darling** *non by city OU2*
- **Scott Fetzer** *OK*

These are 3 of the 5 that were noticed for OU1, the excluded parties were the City and Bronson Plating, which reportedly did not use the sewer.

In October 2000, U.S. EPA met with the parties to discuss the SNL issued on 9/27/00. At this meeting, the PRPs discussed the fact that the industrial sewer was not the only source to groundwater contamination but that the abandoned (former) facilities were a potential major source and proposed to EPA that they evaluate these source areas and remediate prior to evaluating the industrial sewer. After various months of discussions with MDEQ, U.S. EPA and the Parties. U. S. EPA began informal discussions with the Parties to evaluate the source areas

January 3, 2002

and negotiations for OU2 were concluded in March 2001. As part of the source areas, each party will evaluate the industrial sewer within their property and after that if anything is left outside their properties, we can come back to determine if OU2 for this site remains a concern.

U.S. EPA decided that the source areas would not form part of the SF site and would be evaluated as a separate Site (Non-NPL): **North Bronson Former Facilities**

MDEQ - CA in place for Management Assistance